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December 30, 2020

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The Honorable Joel C. Hoppe
Magistrate Judge
United States District Court for the Western District of Virginia
116 N. Main Street
Room 314
Harrisonburg, VA 22802

Re: *Brennan M. Gilmore v. Alexander E. (Alex) Jones, et al.*, No. 3:18-cv-00017-NKM-JCH

Dear Judge Hoppe:

We are counsel to Plaintiff in the above-referenced matter. We write concerning the pending motion to compel that Plaintiff filed on July 31, 2020. D.I. 207.

On July 17, 2020, following a hearing on discovery disputes, the Court entered an order inviting Plaintiff to file a motion to compel regarding discovery responses from Defendants Alex Jones, Infowars, LLC, Free Speech Systems, LLC, and Lee Ann McAdoo (collectively, the “Infowars Defendants”). D.I. 202.

On July 31, 2020, Plaintiff filed a motion to compel discovery from the Infowars Defendants (the “Motion”). D.I. 207. On August 14, 2020, the Infowars Defendants filed an opposition to the Motion. D.I. 208. On August 21, 2020, Plaintiff filed a reply in support of the Motion. D.I. 209.

The Court has not yet ruled on the Motion, which will significantly impact how Plaintiff will proceed with discovery and depositions. D.I. 207. Plaintiff respectfully submits that a ruling on the Motion is important to moving the fact discovery process forward.

Fact discovery is currently scheduled to end on March 1, 2021. D.I. 206. Plaintiff and Mr. Stranahan have separately filed a motion to amend the case schedule in view of, among other things, the pending decision on the Motion and the ongoing national pandemic. (D.I. 217).

Very truly yours,

/s/ Anwar Graves

Anwar Graves
for O'MELVENY & MYERS LLP

cc: Counsel of record (via ECF) and by email to Mr. Lee Stranahan